

# Modern Slavery Statement For Financial Year 2023

Possability Group Ltd

# Possability

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## About this statement

This Statement is made by Possability Group Ltd (Possability) (ABN 58 638 044 327) to meet our reporting requirements under the *Modern Slavery Act 2018* (Cth) (*Modern Slavery Act*). It applies to our financial year 1 July 2022 – 30 June 2023.

It is important to note that in the financial year Possability merged with Lifestyle Solutions (Aust) Ltd (ABN 85 097 999 347). As a result of the merger Possability Group Ltd is the sole member of Lifestyle Solutions (Aust) Ltd (see new organisation structure below). As a result of the merger Lifestyle Solutions (Aust) Ltd is no longer required to produce a separate modern slavery statement as it is encompassed in the Possability Group Ltd Statement.

We acknowledge that there may be areas of modern slavery risk in our operations and supply chain. This statement provides for a continuous improvement approach to address the risks of modern slavery within our operations and supply chain.

Possability Group Ltd is deeply committed to preventing modern slavery and human trafficking occurring in any of its operations as well as seeking to ensure that our supply chain is also free from such practices. We are also committed to international human rights standards – these are embedded in our approach to valuing and promoting independence for our clients. We intend for our modern slavery risk management approach to be similarly guided by human rights principles and over time built into our organisation's response to risk of harm to people.

Possability Group Ltd will continue to review its supply chains and internal/external operations on an ongoing basis to check compliance.

The Directors and Senior Management Teams of Possability Group Ltd have overall responsibility for ensuring Possability Group Ltd complies with its legal and ethical obligations, and that all persons working for Possability Group Ltd or on our behalf in any capacity comply with it.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is also the responsibility of all persons working for us or on our behalf in any capacity (including our employees, suppliers, workers, directors, and any third -party business partners).

## Our entity's structure, operations, and supply chain

Possability's Group Ltd's structure is represented below.



Corporate Structure current November 2023



Possability Group Ltd is a values-driven disability services provider supporting approximately 3000 people with disability and children and young people in Out of Home Care across Australia. Our ways of working are guided by the principles of our Practice Framework, with the unique pursuit of 'a good life' at the apex. Our operations and how we support people have not materially changed since the last reporting period.

How we support people:

- We support people to live in their own home. Living independently looks different for everyone and some prefer to live on their own and others prefer to share. We also support people in short and medium stays and to build their confidence as they trial moving out of their family home.
- We offer employment and training for people looking to join the workforce, including school leavers. We support people to build the right skills and to find and keep great jobs in the community at award wage. We also provide supported employment

opportunities and are building relationships with commercial partners to increase workforce opportunities in traditional disability support enterprises.

- We provide services that support people to build or maintain their social and community connections.
- Our Positive Behaviour Support services are about partnering with people to improve their quality of life, enrich their relationships and minimise or eliminate restrictive practices.
- We support children in out-of-home care and short-term accommodation (respite). We provide specialist support in a nurturing and safe environment under a trauma informed and attachment-informed model.
- Our Out of Home Care operations consist of services delivered to vulnerable children and young people in our community and as such the very core of our business involves a deep understanding of vulnerable people including the risks of exploitation when working with these individuals and groups. As such, we believe we have an entrenched culture of ensuring that vulnerable people are seen, heard, and treated with respect and dignity.

## Our governance framework

Possability Group Ltd is governed by a Board that appoints the Chief Executive Officer (CEO). The CEO may delegate key functions to an Executive Leadership Team (Executive). The Board sets the strategic direction and overall policy framework within which the Executive manage effective operational oversight of services of support and related business activities. The Executive provides leadership and support to operational managers and oversees effective business systems to ensure Possability Group Ltd delivers the best possible support and services to our participants and clients. Possability Group Ltd’s governance arrangements are set out in the Constitution and all Board, Executive and staff members are required to meet the standards of conduct and behaviour as outlined in the Code of Conduct handbook. The Board of Possability Group Ltd takes a progressive approach to its governance role with responsibilities set out in the Board Charter and inductions of all Board members conducted by the Company Secretary. The Board is assisted by Board committees, which include members of the Board with attendance by various Executive (as set out below). Roles and responsibilities of Board committees are outlined in the committee terms of reference.

<b>Board</b>	<b>Finance Audit, Investment &amp; Risk Committee</b>	<b>Governance Committee</b>	<b>Quality &amp; Safeguarding Committee</b>	<b>Merger Integration Committee</b>
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The operational application of the strategic plan is supported by a Governance Framework, Risk Framework and Policy Framework and Human Rights and Safeguarding Framework

## Modern slavery risks

Possability Group Ltd operates solely in Australia but has suppliers who operate overseas, and we have a complex multi-tiered supply chain as our procurement needs are diverse. We understand this increases the risk of our organisation being directly linked to modern slavery practices through the activities of another entity that we have a procurement relationship with.

Our journey to fully and accurately understand where our risks lie is a continuing one. The purpose of identifying the risks above is so that we can more accurately assess, address, and mitigate these risks. We have conducted some reviews of operational suppliers that indicated the risk of modern slavery practices existing would lie deep within the supply chains.

Our assessment of the likelihood of modern slavery practices existing was determined following a review of suppliers based on operational expenditure and identification of high-risk areas.

## Actions taken to address modern slavery risks

Possability Group Ltd adopts a continuous improvement approach to the review and update of its policies, procedures, and frameworks to ensure relevance and currency of practice.

Previous actions, that remain in place include:

- Code of conduct
- Policies and practices
- Training
- Safeguarding adult people with disabilities, children, and young people
- Supplier engagement and management
- Whistle-blower procedures.

In the last financial year following the merger between Possability Group Ltd and Lifestyle Solutions (Aust) Ltd, we have reviewed the two Modern Slavery policies, and have combined into a singular Possability Group Ltd Policy.

Possability Group Ltd conducted an all-day risk management workshop for the Board and Executive staff where Modern Slavery was highlighted. For the non-executive staff, the Company has developed training material on Modern Slavery as part of the Induction process for new staff.

We have continued to reduce the number of vendors, reducing the number of vendors by a significant amount (over 1000) as we have consolidated both Possability Group Ltd and Lifestyle Solutions (Aust) Ltd's suppliers. During the consolidation process we considered our risk assessment with regards to Modern Slavery.

Possability Group Ltd undertakes a due-diligence process of our suppliers which will continue to be enhanced. We engage with suppliers to ascertain an understanding and compliance with Modern Slavery requirements. As a result of this process, we will not transact with any suppliers if we have any Modern Slavery concerns.

Possability Group Ltd has a Contractor Handbook which explicitly references our Policy and Statement along with providing information to our suppliers. This financial year we have worked on improving our practices regarding contractual assurance and have developed provisions for our contracts under which services and procurement will be engaged. Among other things these contractual clause provisions will require suppliers to:

- warrant that modern slavery practices do not exist in their own businesses;
- warrant, to the best of their knowledge, that modern slavery practices do not exist in the businesses of their suppliers;
- warrant that they will notify us if they become aware that modern slavery is taking place in their operations or supply chains;
- warrant that they have put in place their own processes to ensure these warranties are valid.

The provisions also permit Possability Group Ltd to terminate the supply contract if the supplier is not complying with any of the above.

We have recently introduced a new property CRM system and all new property contractors must fill out an online application which has questions relating to their Modern Slavery practices. We will extend this application to other non-property existing suppliers over the next 12 months concentrating on the higher risk areas. We have also appointed large companies to handle our procurement in higher risk areas and the appointment of these organisations considered their Modern Slavery processes.

Possability Group Ltd expects all employees to comply with our human rights and modern slavery commitments. Our Whistleblower Policy provides employees with established standards for appropriate workplace behaviours and conduct and provides the avenue for reporting incidents or improper conduct. The Whistleblower Policy was reviewed and endorsed by the governing body which enables all employees to report any concerns comfortably and confidentially, including those that they have relating to modern slavery in Possability Group Ltd's operations or within supply chains.

We are committed to transparent and accountable governance that meets community expectations for an organisation delivering supports and services for some of the most vulnerable people in Australia.

Being a for-purpose organisation, ethics and good governance are crucial to what we do. We believe the following factors assist in our due diligence endeavours to identify, assess, and address risks of modern slavery in our operations and supply chains:

- Expertise applied in practice to our workforce in relation to workplace, industrial relations and workplace health and safety regulations;
- All employees, directors and volunteers of Possability Group Ltd are required to provide 100 points of identification, current police check and evidence of their right to work in Australia prior to commencement of employment;
- Possability Group Ltd has robust governance and compliance mechanisms in place that mitigate the risk of human rights abuses occurring. The Board and its committees have robust safeguarding oversight.

## Assessing effectiveness

In the last year we have been extremely effective in reducing the number of vendors, this consolidation identified Modern Slavery as one of the key metrics. We have highlighted the higher risk industries and suppliers and have put in place measures such as the new CRM to ensure we have formalised processes to measure effectiveness.

## Future steps

We acknowledge that assessing and addressing modern slavery risks is an ongoing process. We have commenced our journey in formalising and operationalising a comprehensive modern slavery risk management framework – and are committed to enhancing our modern slavery response.

To continue our modern slavery response, we plan to take the following steps during the financial year 2024:

1. Conduct a survey of businesses meeting our definition of high risk to further understand their modern slavery response.
2. Ongoing review of annual spend by vendor and subsequent follow up of their modern slavery response.
3. Conducting an awareness training refresher for all Procurement team members.
4. Develop a mechanism to review the effectiveness of modern slavery practices within Possability.

In acknowledging that we are early on in our modern slavery journey we wanted to signal our commitment through our full transparency and encourage dialogue with our stakeholders.

We look forward to outlining the steps taken to enhance our modern slavery response in our next Statement.

## Board approval

This statement has been made on behalf of Possability Group Ltd “Possability”. This statement covers all entities owned or controlled by Possability Group Ltd under ABN 58 638 044 327. This statement provides an overview of the steps taken by Possability during the financial year ending 30 June 2023 to address modern slavery risks in its operations and supply chain. This statement is approved by the Possability Group Ltd Board on 22 December 2023.



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Tony Pearson  
Board Chair, Possability Group Ltd  
22 December 2023